

EXHIBIT X

G. MARK ALBRIGHT, ESQ. (1394)

DANIEL R. ORMSBY, ESQ. (14595)

KYLE W. FENTON, ESQ. (16235)

**ALBRIGHT STODDARD, WARNICK &
ALBRIGHT**

801 South Rancho Drive, Suite D-4

Las Vegas, Nevada 89106

T: (702) 384-7111 / F: (702) 384-0605

gma@albrightstoddard.com

dormsby@albrightstoddard.com

kfenton@albrightstoddard.com

-and-

MICHAEL MACHAT, ESQ.

California State Bar Number 109475

Appearing pro hac vice

MACHAT & ASSOCIATES, PC

8730 W. Sunset Blvd., Ste. 250

W. Hollywood, California 90069

Telephone: (310) 860-1833

Email: michael@machatlaw.com

Attorneys for Plaintiff

SONIA FELDMAN

UNITED STATES DISTRICT

DISTRICT OF NEVADA

SONIA FELDMAN,

Plaintiff,

v.

MARK ANTHONY SAWYER, ET AL,

Defendants.

Case Number: 2:24-cv-00526-JCM-MDC

**PLAINTIFF SONIA FELDMAN'S
FIRST SET OF REQUESTS FOR
ADMISSIONS SERVED ON DEFENDANT
MARK ANTHONY SAWYER**

PROPOUNDING PARTY: Plaintiff Sonia Feldman

RESPONDING PARTY: Defendant Mark Anthony Sawyer

RFA Set No: One

**PLAINTIFF'S 1ST SET OF REQUESTS FOR PRODUCTION OF ADMISSIONS
SERVED ON DEFENDANT MARK ANTHONY SAWYER**

Pursuant to Rule 36 of the Federal Rules of Civil Procedure, Plaintiff Sonia Feldman, by and through her attorneys, hereby serves her 1st Set of Requests for Admissions to Defendant Mark Anthony Sawyer.

INSTRUCTIONS

If, in responding to this First Set of Requests for Admissions ("Requests"), Responding Party encounters any ambiguities when construing a Request, Responding Party shall respond to the best of his, her or its ability and such response shall set forth the matter deemed ambiguous, and the construction used in responding.

DEFINITIONS

1. "Person(s)" refers to and includes, without limitation and in the singular as well as the plural, natural persons, attorneys in fact, powers of attorney, partnerships, corporations, limited liability companies, firms, joint ventures, groups, businesses and other associations, law firms, estates, trusts, and all other organizations and entities, unless the context specifically indicates otherwise.

2. The terms "related to" and "referring to" or "associated with" means, in whole or in part, constituting, evidencing, concerning, regarding, containing, embodying, reflecting, describing, involving, identifying, stating, referring to, dealing with, or in any way pertaining to.

3. The term "communications" shall include, without limitation, all letters, emails, handwritten or typewritten notes, notebooks, sound and/or voice recordings, voicemails, text messages, instant messages on any messaging platform, transcripts of sound recordings, tapes or other sound/voice recordings, contracts, agreements, reports, computer records, audio and videotapes, messages, summaries, and/or any other documentation, however produced or reproduced, whether sent, received or neither, including the original, draft, copies, and non-identical copies and the transmittal of such information in any form whatsoever.

4. The terms “and” or “or” have both conjunctive and disjunctive meanings.

5. The terms “any” and “all” mean “each” and “every.”

6. The terms “you” and “your” refers to Defendant Mark Anthony Sawyer.

REQUESTS FOR ADMISSIONS:

Request for Admission No. 1:

Admit that at the time you formed the MJS Nevada Trust you were insolvent?

Request for Admission No. 2:

Admit when you formed the MJS Nevada Trust, You owed more money than you had available to pay out to all those who had bridge loans with you if they all asked to withdraw their funds from your program.

Request for Admission No. 3:

Admit that you set up the MJS Nevada Trust while you were running a Ponzi scheme.

Request for Admission No. 4:

Admit that you set up the MJS Nevada Trust so you could hide your assets from Plaintiff.

Request for Admission No. 5:

Admit that you set up the Nevada MJS Trust so you could shield your assets from Plaintiff in case she sued you for the money you agreed to pay her.

Request for Admission No. 6:

Admit that during the period from January 29, 2021, when Plaintiff wrote her first check to you for \$10,000 on January 29, 2021, through the end of 2021, you were running a Ponzi scheme.

Request for Admission No. 7:

Admit you were using Plaintiff's monies to fund debts you owed others.

Request for Admission No. 8:

Admit that at the time you obtained Plaintiff's check for \$1,166, 337.13 you were insolvent.

Request for Admission No. 9:

Admit that at the time you obtained Plaintiff's check for \$1,166,337.13 you were unable to pay all the debts that you owed.

Request for Admission No. 10:

Admit that instead of using the Plaintiff's check for \$1,166,337.13 to make a bridge loan to others, you instead used that money to partially fund the Vegas Auto Gallery.

Request for Admission No. 11:

Admit that you lied to Plaintiff so she would invest over a million dollars in your bridge loan program.

Request for Admission No. 12:

Admit that you told Ms. Feldman you would be able to more than double her money by using her money in your bridge loan program.

Request for Admission No. 13:

Admit that when you told Ms. Feldman you would be able to more than double her money by using her money in your bridge loan program, that was a lie.

Request for Admission No. 14:

Admit that you promised to treat Plaintiff like your daughter.

Request for Admission No. 15:

Admit that you lied when you promised to treat Plaintiff like your daughter.

Request for Admission No. 16:

Admit that you lied when you promised to treat Plaintiff like your daughter in order to gain her trust.

Request for Admission No. 17:

Admit that you lied when you promised to treat Plaintiff like your daughter in order to gain her trust so she would agree to invest over a million dollars into your bridge loan program.

Request for Admission No. 18:

Admit that once you had Plaintiff's money, you convinced her to roll over her investments?

Request for Admission No. 19:

Admit that each time you convinced Plaintiff to roll over her investments you withheld the fact that you did not have the money to pay her if she had decided to withdraw her funds instead?

Request for Admission No. 20:

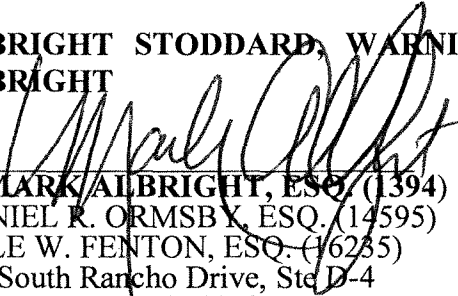
Admit that you used Plaintiff's money to fund your, and your wife's lavish lifestyle?

Request for Admission No. 21:

Admit that you formed the MJS Nevada Trust in order to prevent Plaintiff from recovering the money you cheated her out of?

DATED this 19th day of December, 2024.

**ALBRIGHT STODDARD, WARNICK &
ALBRIGHT**

By: 
G. MARK ALBRIGHT, ESQ. (1394)
DANIEL R. ORMSBY, ESQ. (14595)
KYLE W. FENTON, ESQ. (16285)
801 South Rancho Drive, Ste D-4
Las Vegas, Nevada 89106
T: (702) 384-7111 / F: (702) 384-0605
gma@albrightstoddard.com
dormsby@albrightstoddard.com
kfenton@albrightstoddard.com
-and-

MACHAT & ASSOCIATES, PC
MICHAEL MACHAT, ESQ.

Appearing *pro hac vice*
California State Bar Number 109475
8730 W. Sunset Blvd., Suite 250
W. Hollywood, CA 90069
Attorneys for Plaintiff
SONIA FELDMAN

Las Vegas, Nevada 89106
T: (702) 384-7111 / F: (702) 384-0605
gma@albrightstoddard.com
dormsby@albrightstoddard.com
kfenton@albrightstoddard.com

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of December, 2024, a true and correct copy of the foregoing document was served via the Court's CM/ECF system on all parties currently on the electronic service list.

MARK SAWYER
6940 N. Jensen Street
Las Vegas, NV 89149
Email: msawyer2729@yahoo.com

JENNIFER SAWYER
6940 N. Jensen Street
Las Vegas, NV 89149
Email: jen61002@hotmail.com

NEVADA MJS TRUST
6940 N. Jensen Street
Las Vegas, NV 89149

MJS NEVADA TRUST
6940 N. Jensen Street
Las Vegas, NV 89149

THE PROPERTY LOCATED AT:
508 Setting Moon Street
North Las Vegas, NV 89084-1258

THE PROPERTY LOCATED AT:
6508 Setting Moon Street
North Las Vegas, NV 89084-1258

ATD COMMERCE, LLC
C/o US CORPORATE SOLUTIONS, LLC
2685 S. Rainbow Blvd., Suite 213
Las Vegas, NV 89146

ACM NORHT LLC.
C/o US CORPORATE SOLUTIONS, LLC
2685 S. Rainbow Blvd., Suite 213
Las Vegas, NV 89146

MAS HOLDINGS GROUP, LLC
US CORPORATE SOLUTIONS, LLC
2685 S. Rainbow Blvd., Suite 213
Las Vegas, NV 89146

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1 SAWYER HOLDINGS, LLC
2 C/o JEFFREY BURR, LTD.
3 2600 Paseo Verde Pkwy., Suite 200
4 Henderson, NV 89074

By: //s// Phyllis L. Cameron

Employee of Albright, Stoddard, Warnick & Albright